

# Sage Legal LLC

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January 9, 2026

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Vera M. Scanlon, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13A South  
Brooklyn, NY 11201-1804

**Re: Singh v. Topline NYC Contracting Inc., et al.**  
**Case No.: 1:25-cv-776 (NCM) (VMS)**

Dear Judge Scanlon:

This firm represents Plaintiff Joginder Singh (hereinafter the “Plaintiff”) in the above-referenced case. Regrettably, this is the second time Plaintiff has attempted to write jointly with Defendants to submit this letter regarding the status of discovery, in accordance with this Court’s Order dated December 19, 2025. This letter was to propose a detailed discovery schedule that includes expert discovery.

On December 31, 2025, Plaintiff filed his status report. See ECF Docket Entry [42](#). On January 2, 2026, the Court issued an Order *sua sponte* extending the deadline for the parties to file a joint letter regarding discovery to January 9, 2026 due to Defendants’ failure to respond to Plaintiff’s efforts to meet-and-confer.

Regrettably, counsel for Defendants remains unresponsive.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York  
January 9, 2026

Respectfully submitted,  
**SAGE LEGAL LLC**  
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All counsel of record